



remy green <remy@femmelaw.com>

Clarifying December 8 Deadlines

Musso, Gregory (LAW) <gmusso@law.nyc.gov>

Fri, Dec 8, 2023 at 5:44 PM

To: remy green <remy@femmelaw.com>

Cc: Regina Yu <regina@femmelaw.com>, Protester Cases <Protests@femmelaw.com>

I'm sorry, please just bear with me for a bit longer.

From: remy green <remy@femmelaw.com>

Sent: Friday, December 8, 2023 4:54 PM

To: Musso, Gregory (LAW) <gmusso@law.nyc.gov>

Cc: Regina Yu <regina@femmelaw.com>; Protester Cases <Protests@femmelaw.com>

Subject: Re: [EXTERNAL] Re: Clarifying December 8 Deadlines

Who is "we," and what approval?

If someone else is making all the legal judgments on this case, it's not fair to us, the court, and frankly it's not fair to you, for them not to appear.

Sent from a mobile device, please excuse any thumbing or stumbling.

J. Remy Green

Partner

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| remy@femmelaw.com (e) | (929) 888.9560(direct) |

| (929) 888.9480 (p) | (929) 888.9457 (f) |

| honorific / pronouns: Mx. / they, their, them |

On Dec 8, 2023, at 4:40 PM, Musso, Gregory (LAW) <gmusso@law.nyc.gov> wrote:

I apologize for the delay. We are seeking approval.

From: remy green <remy@femmelaw.com>
Sent: Thursday, December 7, 2023 2:03 PM
To: Musso, Gregory (LAW) <gmusso@law.nyc.gov>
Cc: Regina Yu <regina@femmelaw.com>; Protester Cases <Protests@femmelaw.com>
Subject: [EXTERNAL] Re: Clarifying December 8 Deadlines

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And sorry -- for that last bullet, I meant to cite Tr. 25:6-10; 32:13-16.

J. Remy Green

Partner

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On Thu, Dec 7, 2023 at 1:56 PM remy green <remy@femmelaw.com> wrote:

Hi Greg,

In light of our conversation today, I wanted to clarify what we expect to see (because the Court ordered it) -- in addition to our need to tell the Court that Defendants were completely unprepared to follow the "direction ... to Mr. Musso [to t]alk about ways to limit the search, [and] try to come to an agreement

with Mx. Green on a more limited search and how you can do that search, whether it's by search terms, limiting custodians, [and otherwise] work productively with each other" (Tr. 22-23) -- tomorrow:

1. Sworn interrogatories;
2. Final update on on ongoing searches for interrogatories (Tr. 20);
3. All other issues to raised in my November 15, 2023 letter (re-attached);

Yours,

Remy.

J. Remy Green

Partner

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honorific / pronouns: [Mx.](#) / [they](#), [their](#), [them](#)	
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